

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FOX VALLEY & VICINITY CONSTRUCTION)	
WORKERS WELFARE FUND, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 21 C 2053
)	
EC OF KANKAKEE COUNTY, INC.,)	JUDGE MARY M. ROWLAND
an Illinois corporation,)	
)	
STEPHEN EINFELDT, an individual,)	
)	
Defendants.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendants, EC OF KANKAKEE COUNTY, INC., an Illinois corporation, and STEPHEN EINFELDT, an individual, in the total amount of \$7,573.24, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$1,431.25.

On May 7, 2021, the Summons and Complaint was served on the Registered Agent (by tendering a copy of said documents to Brunetta Einfeldt) at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on May 28, 2021. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

In addition, on May 7, 2021, the Summons and Complaint was served on Defendant Stephen Einfeldt (by tendering a copy of said documents to Brunetta Einfeldt) at his residence (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on

May 28, 2021. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Cecilia M. Scanlon _____

Cecilia M. Scanlon
Attorney for the Plaintiffs
BAUM SIGMAN AUERBACH & NEUMAN, LTD.
200 West Adams Street, Suite 2200
Chicago, IL 60606-5231
Bar No.: 6288574
Telephone: (312) 216-2577
Facsimile: (312) 236-0241
E-Mail: cscanlon@baumsigman.com

I:\Fvcwj\EC of Kankakee\motion for entry of default and judgment.cms.df.wpd

CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 18th day of June 2021:

Mr. Stephen Einfeldt, Registered Agent
EC of Kankakee County, Inc.
1501 Sir Lancelot
Bourbonnais, IL 60914-9624

Mr. Stephen Einfeldt
1501 Sir Lancelot
Bourbonnais, IL 60914-9624

/s/ Cecilia M. Scanlon _____

Cecilia M. Scanlon
Attorney for the Plaintiffs
BAUM SIGMAN AUERBACH & NEUMAN, LTD.
200 West Adams Street, Suite 2200
Chicago, IL 60606-5231
Bar No.: 6288574
Telephone: (312) 216-2577
Facsimile: (312) 236-0241
E-Mail: cscanlon@baumsigman.com